

37047

Asbestos Dump Site
Site Operation Plan

John Czapor, Chief
Site Investigation and Compliance Branch

Lisa Gatton, Quality Assurance Chemist
Monitoring Management Branch

Enclosed for your review is the most recent revised draft Site Operations Plan, for the Asbestos Dump Sites. You will also find a copy of the EPA's comments to Fred C. Hart Associates along with their response to each comment. As you will see, a few of your comments were not forwarded to Fred C. Hart. The following is justification for their omission:

Stainless vs Galvanized Steel

We feel that the construction material (galvanized steel) is adequate for the background well # 901.

Dissolved metals vs Total Metals

We prefer dissolved metals analysis to total metals analysis because it is more representative of the groundwater. In addition the filtering involved will lessen the chances of the samples being contaminated by other contents of the well.

Air Sampling

We believe that the changes in the SOP relating to air sampling are sufficient to undertake field activities. In addition we do not believe it is necessary to conduct research type sampling activities during the RI/FS. Extra precaution will be taken during all subsurface activities as stated in the Health & Safety Plan, to minimize the chances of asbestos fibers becoming airborne. This will be accomplished by properly wetting the affected areas.

We appreciate your comments on the RI/FS, SOP.

I hope this review will lead to a final approval of the SOP. If you should have any further questions, you may contact Nigel Robinson at (212) 264-8674.

ERRD: NJICS: NROBINSON: nr: 4/30/86		CONCURRENCES					
SYMBOL	NJICS	NJICS					
SURNAME	NROBINSON	JCZAPOR					
DATE	4/2/86						

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

ASB 001 0668

FL